

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

United States of America

v.

Cr. No. 11-06-01-JL

Brian Mahoney

**UNITED STATES' ASSENTED-TO MOTION TO EXTEND TIME TO RESPOND
TO DEFENDANT'S MOTIONS (Documents #180, #181, #182)**

NOW COMES the United States of America, by and through John P. Kacavas, United States Attorney for the District of New Hampshire, and Arnold H. Huftalen, Assistant United States Attorney, and hereby requests that the Honorable Court grant it an extension of time to February 10, 2014, to respond to defendant's Motion for Evidentiary Hearing (Document #180); Motion for Discharge (Document #181), and Motion for Services Other than Counsel (Document #182), for the following reasons:

The United States will be dismissing the criminal case against the defendant, which will omit the issues, however, we are in consultation with the US Attorney's Office and the Bureau of Prisons regarding the timing of such and the possible impact such might have on the civil proceeding pending in United States District Court for the District of Massachusetts.

The defendant, through counsel, Andrew Schulman, assents to the relief sought in this Motion. Additionally, it appears that no prejudice will result to defendant if an extension is granted.

WHEREFORE, the United States respectfully requests that the Court grant it an extension of time until February 10, 2014 to respond to the defendant's Motions.

February 7, 2014

/s/ Arnold H. Huftalen
Arnold H. Huftalen
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CERTIFICATE OF CONCURRENCE & SERVICE

I, Arnold H. Huftalen, hereby certify that counsel for the defendant, Andrew Schulman, assents to the granting of this Motion and that a copy of the Motion is being served upon Attorney Schulman via ECF filing.

/s/ Arnold H. Huftalen
Arnold H. Huftalen
Assistant U.S. Attorney